

Appl. No. «10/735,217»  
Amdt dated September 20, 2006

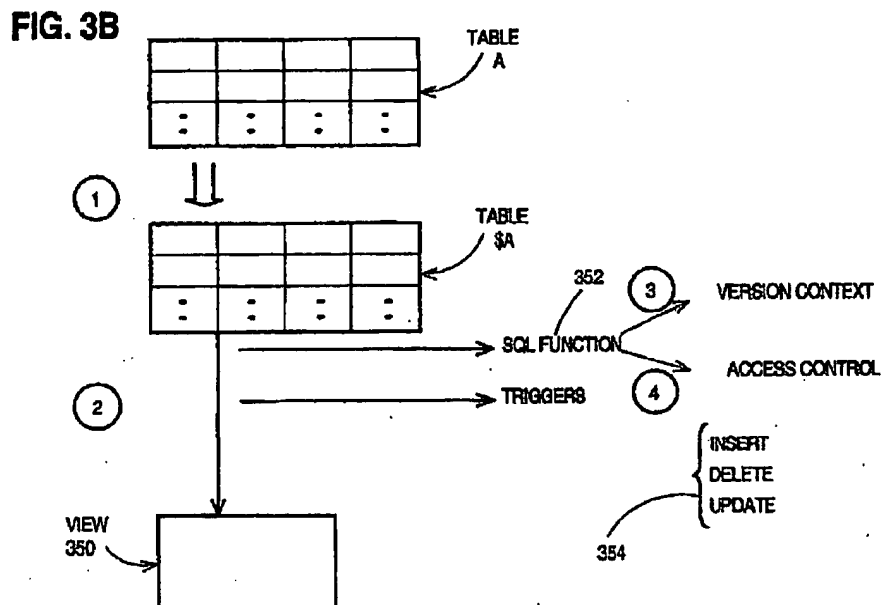
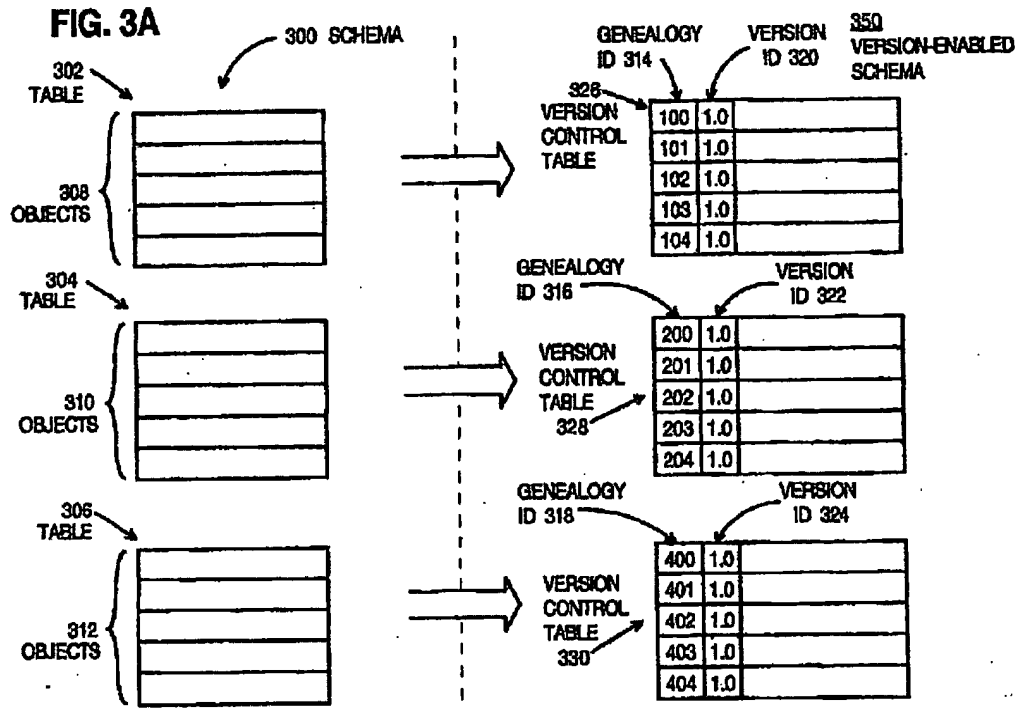
### REMARKS/ARGUMENTS

Claim 16 was rejected under 35 U.S.C. §102(b) as being anticipated by US Patent 6,460,052 granted to Thomas. The only explanation for the rejection provided by the Examiner was as follows:

With respect to claim 16, Thomas discloses a method of managing a repository containing multiple versions of an object, the method comprising: inserting into a first table, a row for a first object being added to the repository, the first table comprising a column for a minimum version number of a second object and another column for a maximum version number of the second object (figure 3 clearly shows that the system implementing the method of inserting version numbers in columns and rows)(fig. 3); and in response to a query to which a plurality of versions of the first object are responsive, selecting a version of the first object for which a version of the second object falls between the minimum version number and the maximum version number, wherein said version of the second object is responsive to the query (i.e., *"In response to a request from a user to retrieve the particular object, a version of the particular object to present to the user is determined based on a workspace associated with the user. The version of the particular object is presented to the user without exposing values from the second set of one or more columns to the user"* the preceding text clearly indicates that upon sending a query the requester receives some versions pertaining to that particular object without exposing all of the version associated with that object)(abstract).

From the above-quoted text, it is clear that the Examiner relies on only "Figure 3" and on two sentences from Thomas. Accordingly, since anticipation is the ground of rejection, the Examiner's position appears to be that the two sentences and "Figure 3" completely disclose all the limitations of Claim 16. FIGs. 3A and 3B of Thomas are reproduced below for convenience.

Appl. No. «10/735,217»  
Amdt dated September 20, 2006



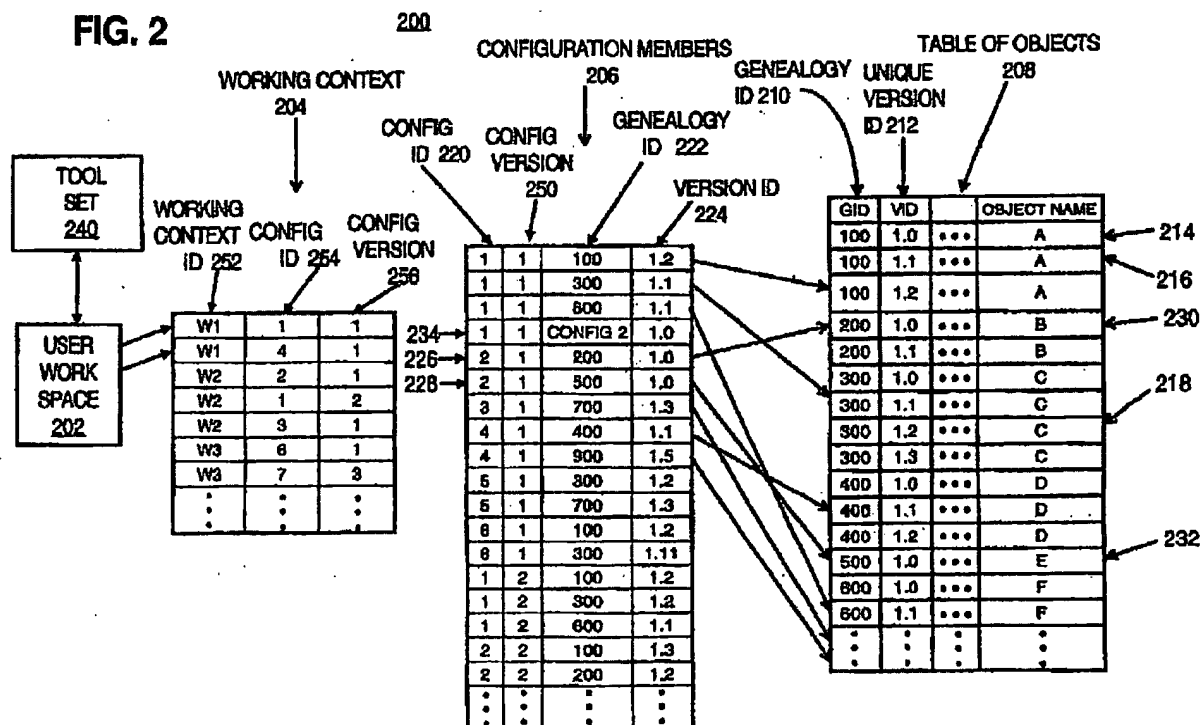
Appl. No. «10/735,217»

Amdt dated September 20, 2006

As can be seen from FIG. 3A, Thomas discloses three columns 320, 322 and 324 for version ID in the three version control tables 326, 328 and 330 respectively. Note further that a single value of "1.0" is shown in all rows of all these tables. In the above-quoted two sentences of Thomas and in FIGs. 3A and 3B, Thomas fails to disclose or suggest any limits on version numbers. More specifically, this citation by the Office Action fails to cite a "minimum" version number and a "maximum" version number as in Claim 16.

Hence, the Office Action fails to show that Thomas discloses two separate columns, namely a column for a minimum version number and another column for a maximum version number. The Office Action further fails to show that Thomas discloses selecting a version of a first object for which a version of a second object falls between the minimum version number and the maximum version number.

In this context, note that the Examiner stated in the middle of page 5 of the Office Action that "(the elements on figure 2 clearly indicates objects being stored as minimum and maximum as being infinity illustrated by the dotted elements below the table)(Fig. 2)". Thomas's FIG. 2 is reproduced below for convenience.



Appl. No. «10/735,217»  
Amdt dated September 20, 2006

Thomas discloses in FIG. 2 only one column that can hold a version number in each table, namely column 212 in table 208 and column 224 in table 206. Thomas fails to disclose that either column 212 or column 224 holds a "maximum" or a "minimum" which are used as limits on his version number. Instead, both these columns appear to hold a version number's value itself. The Examiner's citation to the dotted elements at the bottom of each table in Thomas's FIG. 2 does not overcome this deficiency because Thomas's dotted elements appear to represent additional rows in each table. Such additional rows by Thomas cannot anticipate columns as recited in Applicants' claims. Specifically, Thomas's FIG. 2 does not show "a column for a minimum version number" and a "column for a maximum version number".

In view of the above remarks, Applicant respectfully requests the Examiner to withdraw the prior art rejection of Claim 16. Claims 17-25 depend from Claim 16 and are believed to be patentable for at least the same reasons as Claim 16.

Moreover, Claims 4, 13 and 26 also recite a minimum version number column and a maximum version number column. Hence, these claims are also believed to be patentable over the Examiner's citation in Thomas's patent. Note that these claims do not depend from Claim 16, but are nonetheless believed to be patentable, for similar reasons.

Claim 1 was also rejected as being anticipated by the teachings of Thomas. The Examiner cited to Thomas's column 6 at lines 37-45 (see bottom of page 2 of the Office Action), which is reproduced below

As previously indicated, the version control mechanism provides an object identity scheme that associates additional identity information with every object version within the repository. FIG. 2 illustrates a repository 200 that includes a table of objects 208, a list of configuration members 206, a working context table 204, a user work space 202 and a set of tools 240. Object table 208 includes a plurality of rows or entries that are each associated with a specific version of a particular object within repository 200.

The Examiner further cited to column 2, lines 64-67 and column 3 lines 1-5 (see top of page 3 of the Office Action), which are also reproduced below.

Appl. No. «10/735,217»  
Amdt dated September 20, 2006

schema. The method includes reading a first set of table definitions that belong to the non-versioned schema. A  
65 second set of table definitions is generated for the version-enabled schema such that each table definition in the second set of table definitions corresponds to a table definition in the

### 3

first set of table. Each table definition in the second set of table definitions includes columns that correspond to the columns of the corresponding table definition in the first set of table definitions and one or more additional columns for storing version information.

5

Since anticipation is the ground of rejection, the Examiner's position appears to be that the above-cited text completely discloses all the limitations of Claim 1. Applicant respectfully traverses this rejection for the following reasons.

Firstly, in the above-cited text from Thomas, there is no disclosure whatsoever of inserting two rows into two tables, each row comprising a version number of the first object. Instead, the above-cited text states that "a first set of table definitions that belong to non-versioned schema" (see the top of this page of this Amendment). Clearly Thomas's "non-versioned" term means that a version number is not used, at least in the first set of tables. In contrast, Claim 1 requires both tables to have a version number column.

Secondly, although not cited by the Examiner to reject Claim 1, Thomas does disclose elsewhere that there are two tables each of which has a column to hold a version number, specifically as noted earlier (at the top of the previous page of this Amendment). See column 212 in table 208 and column 224 in table 206 of FIG. 2. However, this disclosure by Thomas fails to show Claim 1's inserting of a second row which stores at least one identifier of a second object to which a first object is "related" (as per Claim 1). Specifically, Claim 1's second row identifies a relationship between the two objects, which appears to be not shown in either of tables 206 and 208 of FIG. 2 of Thomas.

Thirdly, Applicant's specification explicitly points out an advantage of storing such relationship, at page 5 lines 4-6 ("Use of the just-described set that is expanded to contain

SILICON VALLEY  
PATENT GROUP LLP

2350 Mission College Blvd  
Suite 360  
Santa Clara, CA 95054  
(408) 982-8200  
FAX (408) 982-8210

Appl. No. «10/735,217»  
Amndt dated September 20, 2006

the relationship eliminates the need to change a definition of an object in the repository if the only change is in the relationship").

Fourthly, see Applicant's specification at page 13 at lines 17-24. As stated therein, the Applicant recognized that "Use of a "version-configuration-relation" map is believed to be patentably distinguishable over US Patent 6,460,052."

Accordingly, if the Examiner continues to reject Claim 1 over the teachings of Thomas in the next Office Action, Applicant respectfully requests the Examiner to provide a pin-point citation in Thomas, as to where does Thomas disclose storing a first object's relationship to a second object, as recited in Claim 1.

Thus, Applicant respectfully submits that Claim 1 is patentable over Thomas. Reconsideration and withdrawal of this rejection is respectfully requested. Claims 2-14 depend from Claim 1 and are, therefore, likewise patentable.

Claim 15 also recites a second row which comprises an identifier of a second object to which a first object is related. Hence, Claim 15 is believed to be patentable for reasons similar to Claim 1.

Claim 8 is amended herewith to make explicit a limitation inherent therein as originally filed. For support, see, for example, Applicant's specification page 5 lines 27-30.

Applicant hereby draws the Examiner's attention to US Application 10/734,860 which was initially cited in Applicant's specification at page 1 lines 4-9. The Examiner is respectfully requested to thoroughly review the file history of this related application, in view of the fact that a currently-outstanding Office Action also cites to US Patent 6,460,052 granted to Thomas which has been cited against claims in the current application.

For the above reasons, Applicant respectfully requests allowance of all Claims 1-26. If there are any questions concerning this response, please call (408) 982-8203.

**CERTIFICATE OF FACSIMILE TRANSMISSION**

I hereby certify that this correspondence is being facsimile transmitted to the U.S. Patent and Trademark Office to the fax number 571-273-8300 on September 20, 2006.

*S. Omkar*  
Attorney for Applicant(s)

*Sept 20, 2006*  
Date of Signature

Respectfully submitted,

*S. Omkar*

Omkar K. Suryadevara  
Attorney for Applicant(s)  
Reg. No. 36,320

SILICON VALLEY  
PATENT GROUP LLP  
40 Mission College Blvd.  
Suite 350  
Santa Clara, CA 95054  
(408) 982-8200  
FAX (408) 982-8210